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11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 JUSTIN L. TRIPP,  
14 Plaintiff,  
15 vs.  
16 CLARK COUNTY, et al  
17 Defendants.

CASE NO: 2:17-cv-01964-JCM-BNW

18 **STIPULATION AND ORDER TO**  
19 **EXTEND TIME FOR PLAINTIFF TO**  
20 **RESPOND TO DEFENDANTS'**  
21 **MOTIONS FOR SUMMARY**  
22 **JUDGMENT**  
23 **(Second Request)**

24 COMES NOW, Plaintiff Justin Tripp ("Plaintiff"), by and through his counsel, the law  
25 firm of Hatfield & Associates., Ltd., appearing *pro bono publico*, and Defendant Cesar Esparza,  
26 Defendant Las Vegas Metropolitan Police Department, Defendants Michael Rose and Jacquelyn  
27 Schumaker and Defendants LVMPD Sergeants' (hereinafter "LVMPD Defendants") by and  
28 through their counsel, the law firm of Kaempfer Crowell, and Defendant NaphCare, Inc.,  
Defendant Harry Duran, M.D., Defendant Eric Lopez, P.A., Defendant Rachel Scheiblich,  
Defendant Kendra Meyer, and Defendant Raymond Mondora, (hereinafter "NaphCare  
Defendants"), by and through their counsel, the law firm of Lauria Tokunaga Gates & Linn,  
LLP, hereby stipulate and agree to extend the time for Plaintiff to Respond to the following  
Defendants' Motions for Summary Judgment, due on July 16, 2021, to October 14, 2021:

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1. Defendant Cesar Esparza's Motion for Summary Judgment [ECF #198];
2. Defendant Las Vegas Metropolitan Police Department's Motion for Summary Judgment [ECF #199];
3. Defendants Michael Rose's and Jacquelyn Schumaker's Motion for Summary Judgment [ECF #200];
4. Defendants' LVMPD Sergeants' Motion for Summary Judgment [ECF #201].
5. NaphCare Defendants' Motion for Summary Judgment [ECF #197].

This request is submitted pursuant to LR IA 6-1, 6-2 and 7-1 and is the parties' second request for an extension of time for Plaintiff to respond to Defendants' Motions for Summary Judgment.

Good cause exists for this extension. Plaintiff's counsel is requesting a ninety (90) day extension of time up to and including October 14, 2021, to respond to all parties' Motions for Summary Judgment as Plaintiff is in prison, communication must be scheduled, and the volume of the motions. Plaintiff has recently informed his counsel that he is being transferred to another Federal Prison but does not know when he will arrive and where he will be residing at this time. In addition, Plaintiff was not permitted to take his legal documents with him on the airplane. Therefore, Plaintiff's counsel will have to forward all of the legal documents to his new location when the information is available. Defendants have courteously granted this extension of time

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for Plaintiff to file his Responses. Accordingly, Plaintiff shall have up to and including October 14, 2021, to respond to Defendants' Motions for Summary Judgment [ECF #198], [ECF #199], [ECF #200], [ECF #201] and [ECF #197].

DATED this 9<sup>th</sup> day of July, 2021

DATED this 9<sup>th</sup> day of July, 2021

**HATFIELD & ASSOCIATES**

**KAEMPFER CROWELL**

*/s/ Trevor J. Hatfield*  
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*/s/ Lyssa S. Anderson*  
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*Attorneys for Defendants Cesar Esparza,  
Michael Rose, Jacquelyn Schumaker, LVMPD  
Sergeants'.*

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1 DATED this 9<sup>th</sup> day of July, 2021.

2 **LAURIA TOKUNAGA GATES & LINN, LLP**

3 */s/ Paul A. Cardinale*

4 By: \_\_\_\_\_  
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14 *Attorneys for NAPHCARE, INC., an Alabama Corporation; HARRY DURAN, M.D., in his*  
15 *individual capacity; ERIC LOPEZ, P.A., in his individual capacity; RACHEL SCHEIBLICH*  
16 *(formerly known as "RUDD") in her individual capacity; KENDRA MEYER (formerly known as*  
17 *SCHULTZ") in her individual capacity, and RAYMOND MONDORA*

18 **ORDER**

19 **IT IS SO ORDERED:**

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21 \_\_\_\_\_  
22 UNITED STATES DISTRICT COURT JUDGE

23 Dated: July 16, 2021  
24 \_\_\_\_\_  
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